

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALONZO HARRIS, *et al.*

Defendants.


**Criminal Action No.
3:17-CR-254 (GTS)**

PLEASE TAKE NOTICE that upon the attached Declaration of H Dana VanHee, attorney for the defendant, Alonzo Harris, the defendant will move before the Hon. Glenn T. Suddaby, United States District Courthouse, 100 South Clinton Street, Syracuse New York, on submission, unless otherwise directed by the court, for the following *in limine* relief:

1. Pursuant to Federal Rules of Evidence Rule 403 and Rule 609, to exclude evidence of, and testimony regarding, Mr. Harris's criminal history and of reference to Mexican drug cartels, generally, or a particular Mexican Drug Cartel, specifically.
2. Pursuant to Rules 801, 802 and 803 of the Federal Rules of Evidence, to exclude evidence of, and testimony regarding, intercepts of electronic communications, which would constitute inadmissible hearsay.

Dated: September 14, 2018

By: _____


H Dana VanHee, Esq.

Bar Roll No. 512529

Attorney for Defendant Alonzo Harris

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